



October 23, 1991

SFUND RECORDS CTR
2390702

Jeff Denison
Waste Management Bureau
Nevada Division of Environmental Protection
123 West Nye Lane
Capitol Complex
Carson City, NV 89710

Re: Salt Removal From Storage Pad

Dear Mr. Denison,

During your visit to our plant on September 26, 1991, it was noted that the number of salt drums removed at that time was less than the number of drums specified to be removed in the Salt Removal Plan.

Due to a number of reasons explained below, ETICAM was unable to maintain the removal rate required in the Salt Removal Plan. In August, several salt bins were filled, and, upon analysis prior to shipment, it was discovered that the stable ferrocyanide compounds are present in excess of the 580 mg/kg limit set for landfill disposal. These bins can not be shipped to any landfills.

Additionally, our primary disposal site, Envirosafe Services of Idaho, Inc. (ESI) suspended approval for disposal of the salt on August 16, 1991 due to "recent US EPA interpretation". See attached letter. Currently, the only approved site where salt can be stabilized and landfilled is at USPCI's Grassey Mountain site in Utah; they also can not handle total cyanides in excess of 580 mg/kg. It should also be noted that this salt was generated prior to the EPA setting Land Disposal Restriction standards for cyanides.

Rhode Island
Corporate Sales
410 South Main Street
Providence, RI 02903
Tel: (401) 831-7242
1-800-541-8673
FAX: (401) 831-7383

Rhode Island
Plant
25 Graystone Street
Warwick, RI 02886
Tel: (401) 738-3261
FAX: (401) 738-1073
EPA# RID 980906986

Nevada
2095 Newlands Dr. E.
Fernley, Nevada 89408
Tel: (702) 575-2760
1-800-648-9931
FAX: (702) 575-2803
EPA# NVD 960895338

Texas
3201 Lucius McCelvey Dr.
Temple, Texas 76500
EPA# TXD 981903768
Illinois
3001 Highway #3
Granite City, IL 62040
EPA# ILD 981531643

Page 2
October 23, 1991

The following actions were taken in July and August to increase the salt removal rate and catch up with the schedule in the Salt Removal Plan:

1. Two additional employees were hired on August 27, 1991 who are exclusively assigned to work on removing drums from the pad, and load them into bins.
2. Drums are being presampled and analyzed for ferrocyanide content before being loaded into bins.
3. New waste profiles and samples of salt were sent to ESI to begin the process to reinstate approval.
4. A second cutoff saw was ordered on July 26, 1991 to allow for continued work while repairs to the other saw are in progress. Note that nearly all drums must be cut open in order to remove the salt which is in the form of a hard block.

Again, we are aggressively managing the removal of the salt and continue to place a top priority to have all the material removed by the completion date of the plan.

Sincerely,



Byron B. Bradd, P.E.
General Manager

cc: Dan Gross, NDEP
Ben Simmons